

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

GILBERT MEDICAL BUILDING LLC,  
and AKY MD GILBERT, LLC,

Plaintiff,

v.

TRAVELERS CASUALTY INSURANCE  
COMPANY OF AMERICA,

Defendant.

Case No. 20-CV-896-R

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**JOINT MOTION FOR AGREED PROTECTIVE ORDER**

Plaintiffs, Gilbert Medical Building LLC and AKY MD Gilbert, LLC, and Defendant, Travelers Casualty Insurance Company of America, jointly move this Court to enter an Agreed Protective Order. In support, the Parties show the Court as follows:

1. The Parties are actively engaged in written discovery and document production in this action.
2. The Parties anticipate that certain materials will be requested in this case which contain confidential, proprietary, and/or trade secret information.
3. The Parties have agreed that such confidential information is deserving of protection against any disclosure or dissemination to anyone except as approved by the Parties and/or this Court.
4. The Parties have agreed to the proposed Agreed Protective Order attached hereto as "Exhibit 1."

5. Pursuant to its terms, the Agreed Protective Order will govern the public disclosure of evidence that the Parties deem to contain “Confidential Information” in accordance with the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Local Civil Rules of the United States District Court for the Western District of Oklahoma, and the Court’s Electronic Case Filing Policies and Procedures.

WHEREFORE, the Parties respectfully request this Court’s approval and entry of the proposed Agreed Protective Order attached as “Exhibit 1.”

Dated this 11<sup>th</sup> day of August, 2021.

Respectfully submitted,

**TAYLOR, FOSTER, MALLETT, DOWNS,  
RAMSEY & RUSSELL**

s/ Darrell W. Downs

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